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January 1, 2024

Via Electronic Case Filing (ECF) Only

Honorable Judith C. McCarthy, United States Magistrate Judge
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: *United States v. Raysa Stephany Colon*
23 Cr. 261 (NSR)

APPLICATION GRANTED

Judith C. McCarthy

Hon. Judith C. McCarthy

1-3-2024

Dear Judge McCarthy,

I write on behalf of my client, the above-referenced Raysa Colon, to request an adjustment of the defendant's curfew (set by your Honor from 7AM to 7PM daily) to accommodate Ms. Colon's new employment and her employer's work schedule. Last week, Ms. Colon was able to secure full-time employment as an OBGYN medical assistant with Woman's Health Pavilion ("WHP"), a Woman's health-service provider affiliated with New York Presbyterian Brooklyn Methodist Hospital. WHP is located 82-12 151st Avenue, Howard Beach, New York 11414. Ms. Colon will be participating in training this week (January 2-5, 2024) at Howard Beach location according to the following schedule:

<u>Day</u>	<u>Start/End Work</u>	<u>Location</u>	<u>Commute Time</u>	<u>Curfew Adjustment</u>
Tuesday	Noon-9PM	Howard Beach	1.0	Return home by 10PM
Wednesday	730AM-4PM	Howard Beach	1.0	Leave home at 630AM
Thursday	Noon-9PM	Howard Beach	1.0	Return home by 10PM
Friday	730AM-4PM	Howard Beach	1.0	Leave home at 630AM

Thereafter, once her training is completed, Ms. Colon will be working at the WHP's three different locations, depending on the day of the week. In addition to the Howard Beach location, WHP has offices at 109-33 71st Road (Suite 2G), Forrest Hills, New York 11375 and 73-09 Myrtle Avenue (2nd Floor), Glendale, New York 11385. I ask that future adjustments to Ms. Colon's

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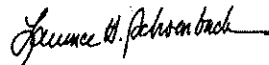
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curfew that will be needed to accommodate her work schedule be made directly by the defendant's Pre-trial officer in accord with the spirit of the within request.

Notwithstanding the holiday weekend and the need to file this request expeditiously, I was able to speak with AUSA Pertz who, on behalf of the government, consents to the within request subject to any input or objection by Pre-trial services.

Accordingly, I request that the Court extend Ms. Colon's curfew in accord with the above-schedule. All other conditions of release remain unchanged.

LAW OFFICES OF
LAWRENCE H. SCHOENBACH



By: _____
Lawrence H. Schoenbach, Esq.

LHS/sms

Cc: AUSA Timothy Josiah Pertz, Esq. (via ECF only)
Raysa Stephany Colon